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Accepted / Filed

DEC 21 2020

Federal Communications Commission
Office of the Secretary

Via Electronic Comment Filing System and Overnight Delivery

December 17, 2020

Ms. Marlene H. Dortch,
Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

ATTN: Chief, Consumer and Governmental Affairs Bureau

RE: nWise AB, Petition for Waiver, Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

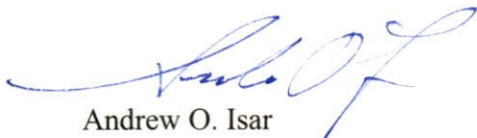
Dear Secretary Dortch:

nWise AB ("nWise") hereby submits a *Direct Video Numbering Directory Access Application* pursuant to Section 64.613(c), 47 C.F.R. § 64,613(c), in the above referenced matters. An electronic copy of the Application was submitted today via the Commission's Electronic Comment Filing System in the proceedings.

Thank you for your attention to this matter. Questions may be directed to me.

Sincerely,

MILLER ISAR, INC.



Andrew O. Isar

Consultants to
nWise AB

Attachments



**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

Accepted / Filed

DEC 21 2020

Federal Communications Commission
Office of the Secretary

In the Matter of)	
)	
Structure and Practices of the Video Relay)	CG Docket No. 10-51
Service Program)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals)	
with Hearing and Speech Disabilities)	

To the Federal Communications Commission Chief, Consumer and Governmental Affairs Bureau:

DIRECT VIDEO NUMBERING DIRECTORY ACCESS APPLICATION

nWise AB ("nWise" or "Applicant"), pursuant to Section 64.613(c) of the Commission's rules, 47 C.F.R. §64.613(c), applies to the Commission for authority to access the Telecommunications Relay Service Numbering Directory ("Directory") directly as a Qualified Direct Video Entity.¹ As set forth below, Applicant has ample, demonstrated technical qualifications and capabilities to access the Directory directly, as it has over the past several years on behalf of a Telecommunications Relay Service Fund eligible video relay services provider. Applicant now seeks direct Directory access as a Qualified Direct Video Entity, independent of any other entity, to provide effective direct, point-to-point video communications for American Sign Language users consistent with the public interest benefits envisioned by the Commission. In support of its Application, Applicant states as follows.

I. INTRODUCTION

On March 1, 2019, Applicant submitted a petition for waiver of Sections 64.613(a)(1), 64.613(a)(2), 64.613(a)(4), 64.613(b)(2) and 64.623(c) of the Commission's regulations, 47 C.F.R. §§ 64.613(a)(1), 64.613(a)(2), 64.613(a)(4), 64.613(b)(2) and 64.623(c), to gain direct

¹ As defined, 47 C.F.R. § 64.601(31).



access to the Directory to provide direct video services and other point-to-point communications services for the Deaf Community ("Petition").² Applicant's Petition was submitted prior to the Commission's adoption of amendments to Sections 64.611, 64.613, and 64.615 of its rules, 47 CFR §§ 64.611, 64.613, and 64.615 that became effective on October 29, 2020.³ Adoption of these amendments rendered Applicant's Petition moot,⁴ but has not changed Applicant's desire for direct Directory access, now under the amended rules as a Qualified Direct Video Entity.

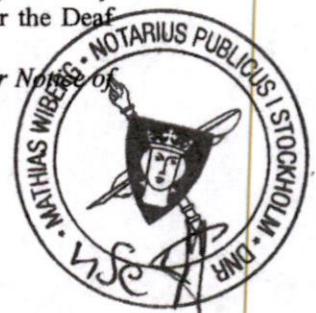
Applicant is an advanced platform-based communications application solutions provider with a long-standing proven ability to meet the complex technical requirements for the provision of direct video communications ("DVC"), Real-time Text, and other direct communications applications in Europe and Asia, and now in the U.S. Applicant has designed and provides a suite of communications applications that enhance communications capabilities between the Deaf, Hard-of-Hearing, DeafBlind, and individuals with speech impairment, and governmental institutions and commercial enterprises that serve them in Europe and Asia. Applicant seeks to provide these advanced communications solutions in U.S. To make these services available to the public, Applicant seeks direct access to the TRS Numbering Directory as a Qualified Direct Video Entity to incorporate new numbers assigned to DVC service subscribers.

Applicant already has direct TRS Numbering Directory access in the U.S., albeit as a contracted automatic call distribution platform provider for a TRS Fund-eligible VRS provider

² See, *See, Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, Petition for Waiver of Sections 64.613(a)(1), 64.613(a)(2), 64.613(a)(4), 64.613(b)(2) and 64.623(c) of the Commission's Rules and Request for Declaratory Ruling Authorizing Access to the TRS Numbering Directory for the Provision of Direct Video Services and Other Point-to-Point Communications Solutions for the Deaf Community, nWise AB (March 1, 2019) [Petition].

³ *Id.*, Public Notice announcing the effective date of the Commission's Report and Order and Further Notice of Proposed Rulemaking, 34 FCC Rcd 3396 (2019) (2019 VRS Program Management Order).

⁴ Applicant has contemporaneously requested withdrawal of its Petition, accordingly.



and has already developed secure technical interfaces with the Directory administrator, accordingly.

In its *2019 VRS Program Management Order*,⁵ the Commission reflected on its *Second TRS Numbering Order* and *VTCSecure Waiver Order*, in concluding that

point-to-point video supports the purposes of section 225 more directly than VRS does, because the communication it enables is direct, rather than mediated, and far more efficient. Therefore, our action today provides a major opportunity to enhance the ability of sign language users to engage in more effective, efficient, and private communication with customer support—especially because so much of VRS traffic involves calls placed to the customer support call centers of large businesses and government agencies⁶

Applicant's proven technology and capability to provide DVC for commercial and government sign language users is consistent with the Commission's anticipated benefit of serving enterprise and government call centers. A grant of Applicant's authority to access the Directory as a Qualified Direct Video Entity will contribute to expanding effective communications alternatives for the Deaf, Hard-of-Hearing, DeafBlind, and individuals with speech impairment, consistent with the Commission's intent and public interest.

II. DIRECT VIDEO CUSTOMER SUPPORT REGISTRATION

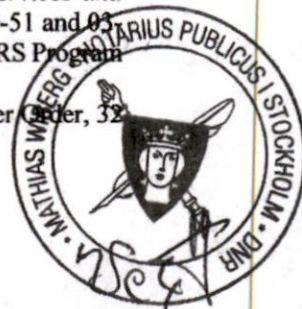
A. The Applicant's Name, Address, Telephone Number, and Email Address (47 C.F.R. §64.613(c)(1)(i))

Applicant's name, address, telephone number, and Email address are:

nWise AB
Salagatan 16A
SE-753 30 Uppsala Sweden
Telephone: +46 8 1200 2600
Direct (USA): 415.854.8159

⁵ See, *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, Report and Order and Further Notice of Proposed Rulemaking, 34 FCC Rcd 3396 (2019) (2019 VRS Program Management Order) (amending 47 CFR §§ 64.611, 64.613, and 64.615).

⁶ *Id.* at 11, citing to Second TRS Numbering Order, 24 FCC Rcd at 821, para. 67; VTCSecure Waiver Order, 32 FCC Rcd at 779, para. 9.



B. Description of the Services to be Provided (47 C.F.R. §64.613(c)(1)(ii))

Applicant proposes to provide direct, point-to-point video communications to qualifying hearing individuals who are fluent in American Sign Language ("ASL"), and to commercial and government enterprise call centers in the U.S. that employ ASL fluent representatives, to enable the Deaf, Hard-of-Hearing, DeafBlind, and individuals with speech impairment to communicate directly with an individual or entity representative entity in ASL without the need for an intermediate video interpreter.

Applicant seeks direct access to the Directory as a as a Qualified Direct Video Entity. Applicant's access to the Directory is necessary to enable its secure platform to determine whether a telephone number is to be routed through the public switched telephone network or via the Directory when the call is placed. If the number has been registered in the Directory, then the call will be routed to the Applicant's client's ASL proficient representatives to enable direct communications between the caller and individuals in ASL without intermediary video interpreter intervention, and to enable Applicant's clients to initiate and/or return point-to-point calls to Deaf, Hard-of-Hearing, DeafBlind, and individuals with speech impairment callers.

Applicant already has ample technical experience and capability to securely access Directory consistent with the Directory's administrator's, iConnectiv, technical specifications, though Applicant's direct Directory access on behalf of a Telecommunications Relay Service Fund eligible video relay services provider, as is a matter of record with the Commission.⁷

Applicant in its role of technology provider for a relay service, provides a service that is fully compatible and tested according to the specifications defined in the SIP Forum VRS

⁷ Applicant's direct Directory access in support its provision of DVC is to be entirely independent, separate from, and in no way related to the Applicant's Directory access in support of its Telecommunications Relay Service Fund eligible video relay services provider client.



U.S. providers Profile TWG-6.1,⁸ already participates in the SIP Interoperability Forum, which ensures compatibility between its applications, including call center technology, and applications provided by all Video Relay Service providers.

C. An Acknowledgment that the Authorization Granted Under this Paragraph (c) is Subject to Compliance with Applicable Commission Rules (47 C.F.R. §64.613(c)(1)(iii))

Applicant acknowledges that the authorization granted for Qualified Direct Video Entity pursuant to 47 C.F.R. §64.613(c)(1)(iii) inclusive of direct access to the Directory is subject to compliance with applicable Commission rules, including, but not limited to, the Commission's customer proprietary network information rules, 47 C.F.R. §§ 64.5101 *et seq.*, where applicable. Applicant has remained in compliance with applicable Commission regulation through its provision of call distribution platform support to a Telecommunications Relay Service Fund eligible video relay services provider. Applicant's direct compliance with applicable Commission regulation is simply an extension of its ongoing compliance on behalf of its video relay service client.

D. Contact Information for Personnel Responsible for Addressing Issues Relating to Such Compliance; (47 C.F.R. §64.613(c)(1)(iv))

The individual responsible for addressing issues relating to Applicant's compliance is

Thor Nielsen
Vice President
nWise AB
Salagatan 16A
SE-753 30 Uppsala Sweden
Telephone: +46 8 1200 2600
Direct (USA): 415.854.8159
Email: thor.nielsen@nwise.se

⁸ SIP Forum VRS US Providers Profile TWG-6.1 is published in the FCC website.



E. Certification that the Applicant's Description of Service Meets the Definition of Direct Video Customer Support and that the Information Provided is Accurate and Complete.
(47 C.F.R. §64.613(c)(1)(v))

Pursuant to Section 64.601(13), Definitions and provisions of general applicability, of the Commission's rules, 47 C.F.R. § 64.601(13), a Direct Video Customer Support is defined as:

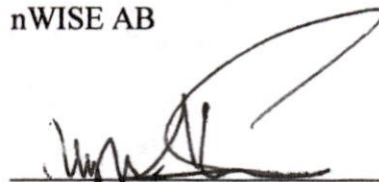
A telephone customer support operation that enables callers with hearing or speech disabilities to engage in real-time direct video communication in ASL with ASL speakers in a call center operation.

Applicant avers that its description and provision of services set forth in the instant Application meets the definition of Direct Video Customer Support and that the information provided herein is accurate and complete, as stated in Applicant's Affidavit, attached hereto.

WHEREFORE, nWise AB respectfully requests that it be authorized to access the Directory as a Qualified Direct Video Entity and provide effective direct, point-to-point video communications for sign language users, as set forth herein.

Respectfully submitted this 17th day of December, 2020,

nWISE AB



Magnus Almén
CEO
nWise AB
Salagatan 16A
SE-753 30 Uppsala Sweden
Telephone: +46 8 1200 2600
Email: thor.nielsen@nwise.se

I, the undersigned, Mathias Wiberg, Notary Public of the City of Stockholm, Sweden, certify that

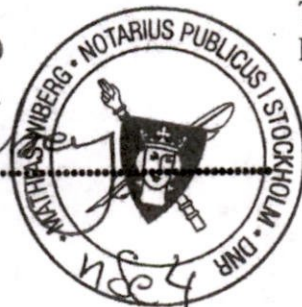
Magnus Almén
.....
duly authorized to sign for
nWise AB
.....
has/ave issued and signed the foregoing document.

Stockholm Sweden

Date 17 XII 2020

Ex officio

Mathias Wiberg
Advokat Mathias Wiberg



AFFIDAVIT

KINGDOM OF SWEDEN

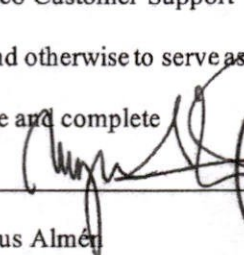
§
§
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CITY OF UPPSALA

1. My name is Magnus Almén. I am the CEO and an officer of nWise AB, an Applicant for direct video numbering access to the Telecommunications Relay Service Numbering Directory.

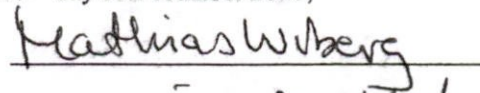
2. I swear and affirm that I have personal knowledge of the facts stated in nWise AB.'s *Direct Video Numbering Directory Access Application*, that I am competent to testify to those facts, and that I have the authority to make this Application on behalf of nWise AB.

3. I further swear and affirm that the description of, and capability to, provide services described in nWise AB.'s *Direct Video Numbering Directory Access Application* are accurate and correct, that nWise AB meets the definition of "Direct Video Customer Support" as set forth in 47 C.F.R. §64.601(15), that nWise AB is qualified technically and otherwise to serve as a Qualified Direct Video Entity, and that the information provided in is accurate and complete

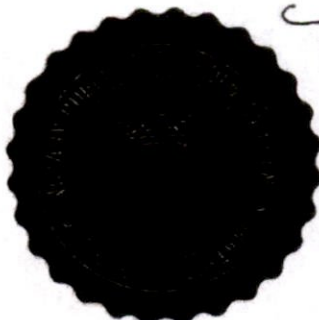
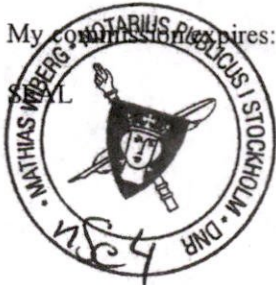

Magnus Almén
CEO
nWise AB
Salagatan 16A
SE-753 30 Uppsala Sweden
Telephone: +46 8 1200 2600
Email: magnus.almen@nwise.se




SWORN TO AND SUBSCRIBED before me on this 17th day of December 2020,


Notary Public in Stockholm
Sweden

My commission expires: _____




Mathias Wiberg



MILLER
ISAR INC.
TRUSTED ADVISORS

ANDREW O. ISAR

4304 92ND AVENUE NW
GIG HARBOR, WA 98335
253.851.6700
WWW.MILLERISAR.COM

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DEC 21 2020

Federal Communications Commission
Office of the Secretary

Via Electronic Comment Filing System and Overnight Delivery

December 17, 2020

Ms. Marlene H. Dortch,
Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

ATTN: Chief, Consumer and Governmental Affairs Bureau

RE: Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Secretary Dortch:

nWise AB ("nWise"), hereby requests withdrawal of its March 1, 2020 *Petition for Waiver of Sections 64.613(a)(1), 64.613(a)(2), 64.613(a)(4), 64.613(b)(2) and 64.623(c) of the Commission's Rules and Request for Declaratory Ruling Authorizing Access to the TS Numbering Directory for the Provision of Direct Video Services and Other Point-to-Point Communication Solutions for the Deaf Community* ("Application") submitted in the above-referenced matter.

The Commission's October 29, 2020 *Public Notice* announcement of the effective date of the 2019 *VRS Program Management Order*¹ and resulting amendments to Sections 64.611, 64.613, and 64.615 of the Commission's rules, 47 CFR §§ 64.611, 64.613, and 64.615, now moot the need for the relief nWise had sought through its Application. nWise has also elected to pursue direct video calling authorization under the Commission's recently amended rules, to be filed under separate transmittal. The Company's pending Application no longer serves its originally intended purpose, accordingly.

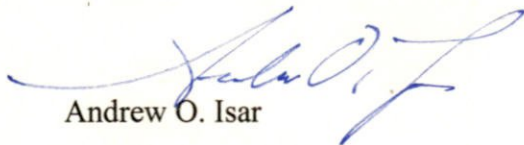
¹ Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 and 03-123, Report and Order and Further Notice of Proposed Rulemaking, 34 FCC Rcd 3396 (2019) (2019 VRS Program Management Order) (amending 47 CFR §§ 64.611, 64.613, and 64.615).

Ms. Marlene H. Dortch,
December 17, 2020
Page 2

Thank you for your kind attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

A handwritten signature in blue ink, appearing to read "Andrew O. Isar", is written over the printed name.

Andrew O. Isar

Consultants to
nWise AB

cc: Eliot Greenwald, Chief Disability Rights Office (via email)
trsreports@fcc.gov